

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LYDIA CARTER,	:	CIVIL ACTION NO.: 02-CV-3602
Plaintiff	:	
	:	
vs.	:	
	:	Assigned to the Honorable Bruce K.
THE WOOD COMPANY and HELEN	:	Kauffman
MCINDOE,	:	
Defendants	:	JURY TRIAL DEMANDED

**RULE 16 MEMORANDUM**

The parties, by and through their undersigned respective counsel, have conferred upon the matters set forth in the Court's August 20, 2002 Order and propose the following discovery plan:

1.

A. The parties do not anticipate the joinder of any additional parties or any amendment to the pleadings.

B. It is not anticipated that any non-dispositive motions, with the exception of discovery motions, will need to be filed. All discovery-related motions must be filed by the completion of the discovery period, proposed as December 31, 2002.

C. All discovery in this matter shall be completed by December 31, 2002.

D. Pretrial Memoranda pursuant to Fed. R. Civ. P. 26(a)(3) and Local Rule of Civil Procedure 16.1(c) must be filed thirty (30) days before the date of trial.

E. The parties will exchange all exhibits at least thirty (30) days prior to the trial date.

F. Plaintiff's expert report is due on or before December 31, 2002. Defendant's expert report is due thirty (30) days thereafter, on January 30, 2003.

G. The deadline to file all dispositive motions is February 15, 2003.

2.

A. The prospects of amicable settlement of this action are fair. The parties have been discussing settlement. An early settlement conference may be helpful to expedite the settlement process.

B. The parties do not agree to referral of this case to U.S. Magistrate Judge Jacob B. Hart for trial.

C. The estimated length of this trial is two (2) days.

D. The Court's jurisdiction is invoked under a federal question, as this suit is substantively based on Title VII of the Civil Rights Act of 1964 and 1991, as amended, 42 U.S.C. § 2000e, *et seq.*

E. The parties agree to participate in a settlement conference and/or mediation in an attempt to resolve this matter amicably.

3. See attached certification of counsel

TALLMAN, HUDDERS & SORRENTINO, P.C. HAHALIS & KOUNOUPIS

BY: \_\_\_\_\_  
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Lydia Carter

**CERTIFICATION**

All counsel has conferred upon each of the above matters and approved the contents of the Rule 16 Memorandum.

TALLMAN, HUDDERS & SORRENTINO, P.C. HAHALIS & KOUNOUPIS

BY: \_\_\_\_\_  
Oldrich Foucek III, Esquire

BY: \_\_\_\_\_  
David L. Deratzian, Esquire

Dated: \_\_\_\_\_

Dated: \_\_\_\_\_